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ABSTRACT

The study of how domestic social service programs have been implemented remains an embryonic field in search of future research directions. Relying largely on their exploratory analysis of the implementation of Title I of the Elementary and Secondary Education Act from a 13-year perspective, the authors argue that a longitudinal approach synthesizing evidence from a confluence of sources merits serious consideration as a research approach for studying implementation in the 1980s. Their longitudinal investigation of two major program requirements for Title I suggests that shifts in administrative policies and procedures in a decentralized policy context are typically dominated by incremental changes: that when aggregated across time, the incremental changes have resulted in substantive structural modifications in implementation policies and practices: and that the pace and direction of these changes have been most affected by a shifting interest group scenario, feedback from previous implementation stages, and broad social movements. The essay also outlines procedural considerations for conducting longitudinal implementation investigations and makes explicit some of the limitations and problems inherent in such an approach. (Author/IRT)

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THE UTILITY OF A LONGITUDINAL APPROACH IN ASSESSING IMPLEMENTATION: A THIRTEEN YEAR VIEW OF TITLE I, ESEA

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Abstract

The study of how domestic social service programs have been implemented remains an embroyonic field in search of future research directions. Relying largely on their exploratory analysis of the implementation of Title I, ESEA from a 13 year perspective, the authors argue that a longitudinal approach synthesizing evidence from a confluence of sources merits serious consideration as a research approach for studying implementation in the 1980's. Their longitudinal investigation of two major Program requirements for Title I suggests (1) shifts in administrative policies and procedures in a decentralized policy context are typically dominated by incremental changes, (2) when aggregated across time, the incremental changes have resulted in substantive structural modifications in implementation policies and practices, (3) the pace and direction of these changes have been most affected by a shifting interest group scenario, feedback from previous implementation stages, and broad social movements. The essay also outlines procedural considerations for conducting longitudinal implementation investigations and makes explicit some of the limitations and problems inherent in such an approach.

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INTRODUCTION

What directions should public policy implementation research take in the 1980's? Certainly the embroyonic and inter disciplinary field of implementation research will benefit from experimentation with and evaluation of numerous research approaches. Still largely unexplored are cross-program comparative case studies and statistical prediction models of implementation. There is also much to be learned from macro case study analyses tracing implementation from policy formation through the measurement of a program's impact on intended recipients at a single point in time. We also are benefitting from an increased number of in-depth descriptions of individual subunits within the implementation scenario.

One largely overlooked direction, however, appears to hold considerable promise in the 80's. We believe a longitudinal case study approach (10 years or more) merits serious consideration. An extended time line of ten years or more seems especially necessary in an implementation context where responsibilities and powers are shared among federal, state, and local agencies. We also contend that evidence for a long-run implementation perspective needs to be collected from a confluence of sources. We base our contention upon an inspection of previous implementation case studies, "meta-implementation" analyses, political and organizational theory, and primarily our current imvestigation of federal efforts to implement the largest federal program in elementary and secondary education.

Relying largely on our present implementation research of Title I of the Elementary and Secondary Education Act, a program which to date

has funnelled over $26 billion to state and local educational agencies with high concentrations of low-income families, we will detail theoretical and empirical arguments for the utility of a longitudinal case study approach. Moreover, we will outline procedural considerations for conducting such investigations, and in the process, make explicit some of the limitations and problems inherent in such an approach.

A THEORETICAL RATIONALE FOR A LONGITUDINAL APPROACH

Less than a decade ago, implementation research pioneers such as Pressman and Wildavsky complained that "except for a few pieces mentioned in the body of this book, we have been unable to find any significant analytic work dealing with implementation" (1973, p. 166). That statement was debatable in 1973; it certainly is not the case today.

Within the last ten years, implementation research of federal domestic programs has passed through two distinct, although overlapping, periods. The first period began in the late 1960's and peaked in the mid 1970's. It was characterized by a flurry of case studies describing the initial few years of implementation for a variety of specific Great Society social service and regulatory programs in education, civil rights, urban development, employment opportunity, health services, and environmental protection (For a summary of the most frequently cited of these first generations case studies, see Sabatier & Mazmanian, 1979, footnotes 2-7; March, footnotes 2-5).

In aggregate these initial, predominately descriptive case studies represented the first stage of theory development, a stage Eckstein has called "probability probes". These early case studies began identifying

variables, mapping relations among variables, and formulating preliminary research assertions before more rigorous theory building and hypotheses testing was initiated (1975).

The most widely cited of these "first generation" short-run case studies:

- were factually dense accounts, usually lacking explicit theory or conceptual frameworks;
- found more failure than success during the initial phases of implementation;
- underscored the wide scope of political, organizational, and socio-economic factors which influenced the implementation process;
- used multiple sources of evidence; and,
- concentrated primarily on the first one to three years of implementation (Yin, 1979, pp. 2-18).

Although this type of case study continued to proliferate in the late 1970's, these earlier analyses along with conceptual models drawn from a variety of disciplines served as fodder for a new type of implementation analysis in the mid and late 1970's, a meta-implementation literature.

Some of these meta-implementation analyses were primarily concerned with setting out conceptual maps for subsequent case studies, (Bardach, 1977; Elmore, 1978; Sabatier & Mazmanian, 1979; Van Horn & Van Meter, 1976) while others gleaned methodological lessons and gaps in the first generation case studies (Meyer, 1979; Williams, 1976; Yin, 1979). These first attempts to conceptualize the implementation process ranged from Bardach's metaphoric concept of a "fixer" who "watch-dogged" the implementation "game" to prototypes of multi-staged, recursive causal models (Sabatier & Mazmanian, 1979). Generally agreeing that at least

some generalizable propositions can be formulated about the implementation of legislated public policy, these researchers and theorticians still differ on fundamental issues such as:

- the factors most affecting the implementation of legislated social programs;
- the linkages among these factors;
- procedures and scales for measuring variations within proposed explanatory "variables";
- appropriate sources and uses as well as limitations of existing data sources and research methodologies; and
- even how to describe or measure implementation.

Certainly, the most comprehensive of the implementation perspectives to date is Sabatier and Mazmanian's attempt to integrate several previous conceptualizations (Bardach, 1977; Lowi, 1969; Van Horn & Van Meter, 1976) into a broad-scoped systems model which emphasizes the legal, political, and socio-economic variables structuring the implementation process. They postulate that four variables most affect a program's first three to five years of implementation:

--the "strength" of the statutes and ensuing regulations	(a) how precisely and consistently the objectives are specified and ranked, and (b) how clearly authority is delegated to organizational subunits
--the presence of a "fixer"	a key legislator or administrator ideologically attuned to program requirements who controls resources important to crucial actors and who has the status, desire, and staff to monitor closely the implementation process
--the resources of various constituency groups	the salience of an issue, the solidarity, the access to policy channels and information, and availability of sidepayments for

	representatives from implementing agencies and intended target group recipients
--the commitment and leadership of agency officials	(a) the direction and ranking of statutory objectives in officials' preference ordering (b) the skills in realizing these preferences

Yet they concede implicitly for the first three factors and explicitly for their most important explanatory factor--the commitment and leadership skills of implementing officials--that these variables are essentially "elusive concepts" (1979, pp. 21-22).

The two factors they hypothesize to have the most significant effect in the long run (after five years), (1) changing socio-economic conditions, and (2) the ability of supportive constituencies to intervene effectively, are equally difficult to quantify. The slippery and global nature of such factors and the inextricably complex dynamics of their interactions lead Yin to conclude that "the research-measure, research-design approach, even in its modified quasi-experimental form, may not readily be applicable to the study of organizational processes." (1979, p. 9).

We are not quite so pessimistic. Instead, we recognize the limitations of the present social science technology expressed in Tukey's research caveat: "Far better an approximate answer to the right question, which is often vague, than an exact answer to the wrong question, which can always be made precise" (1962, pp. 13-14). One pervasive feature of implementation case studies is that they have concentrated almost exclusively on the first three to five years of implementation and this preoccupation with short-run time lines continues in the face of growing

empirical and theoretical evidence that a long-run perspective may reveal quite different patterns. Although the methodology for longitudinal analyses is not particularly exact, it appears that such an approach will broach at least the right questions. For organizational theorists and researchers have observed that when power is distributed widely among a variety of administrative units, legislative factions, and interest groups, one center of power can rarely impose its policies on others (Lindblom, 1959; Lindblom & Braybrooke, 1963; Sharkansky, 1970; Wildarsky, 1975). In such a situation, policies which are the outcomes of bargaining among these actors are likely to reflect only a small degree of change over existing procedures. Incrementalism typically dominates the federal budgetary process, (Wildarsky, 1964, chap. 3) and although perhaps more difficult to measure precisely, regulatory outputs are also likely only to change marginally over the short haul. Cyert and March have noted in their study of various large private and governmental organizations that (1) goals which are often vaguely stated initially to attain consensus, (2) that incrementally these goals are operationalized in standard operating procedures through bargaining and compromise (3) and, over time, "[m]inor changes can lead to more fundamental ones" (March, 1980, p. 23; Cyert & March, 1963).

Salamon provides additional theoretical justification for a longitudinal approach in assessing the effects of Title I. Using a review of previous evaluation research and primarily his analysis of New Deal land reform experiments, he argues that programs which call for the alteration of established social structures are likely to have delayed effects that could be systematically ignored by evaluation designs with short-run time lines (1979, pp. 178-80).

Our preliminary research findings in studying the implementation of Title I from a 13-year perspective reinforces these theoretical arguments for using a longitudinal time line. Specifically we have found:

- given the pluralist nature of the groups responsible for policy setting and implementation of Title I within a highly political and bureaucratic setting of decentralized power, changes in established administrative policies and procedures have been dominated by incremental change;

- when aggregated, these incremental changes have resulted in significant structural and substantive changes in implementation policies and practices;

- the direction of these changes over the long haul has been toward a more aggressive federal rulesetting, monitoring, and enforcement role in implementing some of the Program's crucial categorical requirements, and more congruence with key provisions in the law;

- the following set of inter-related factors have most affected the pace and directions of these changes.

  a) a shifting interest group scenario--from one which was initially dominated by professional education lobbies to one with an orientation toward compliance with federal mandates, including categorical program personnel, beneficiaries of Title I services, and lobby groups championing the receipients' causes;

  b) broad social movements and socio-economic conditions;

  c) specific feedback mechanisms especially reports and exposes produced by external research organizations and activists groups as well as procedures including audits and law suits; and,

  d) the political dynamics of a three-tiered (federal/state/local) structure of administration.

We have traced in-depth two pivotal Program requirements across time-targeting of funds to disadvantaged pupils and program design regulations that result in interventions for target pupils (discussed in more detail on pp. 12 and 31-32). Although in the short run, improvements in the operationalization, monitoring, and enforcement of the requirements

have occurred slowly and intermittently, when viewed from a 13-year perspective, one observes a dramatic shift in the implementation of these two Program regulations. In effect, the standard operating procedures are much closer to federal intent in 1979 than in 1965.

THE PASSAGE OF ESEA, TITLE I

The Elementary and Secondary Education Act was primarily crafted by a handful of top-level assistants from the Johnson Administration and by Francis Keppel, then Commissioner of Education who oversaw the operation of the United States Office of Education (now the Department of Education). They had two primary purposes which were not totally complementary. First, they wanted to find a legislative strategy that would successfully attain what almost every other Congress since World War II had futilely attempted--a strategy that would establish the precedent of federal aid to elementary and secondary schools. Second, they wanted this education legislation to serve as the cornerstone of President Johnson's "War on Poverty" program. To realize the first objective the legislative and administrative strategists devised an ESEA "package" to satisfy "perhaps the widest constellation of interest groups ever assembled on a domestic issue" (Halperin, 1970, H.8493). The original legislation contained five titles with multiple and even conflicting goals. The political viability of the bill was, in fact, enhanced by promising something for most major interest groups and by circumventing, often through obfuscation of statutory language, the issues which had historically contributed to the defeats of previous efforts to increase federal involvement in elementary and secondary

education. The three major obstacles revolved around (1) the debate over whether federal aid should support private schools, either directly or indirectly; (2) the politically volitile issue of providing federal dollars to racially segregated schools; and, (3) a traditional antagonism toward most efforts for federal control over public education.

Title I was and still is by far the largest financial component of the ESEA package with an appropriation for 1979 of over $3 billion. The purpose of the Program, as stated in the bill's "Declaration of Intent" is "... to provide financial assistance to local educational agencies serving areas with high concentrations of children from low-income families to expand and improve their educational programs by various means...." (P. L. 89-10).

Some read this language to mean that the Program's top priority was to begin reform of the entire fabric of American education. Reform in this context meant restructuring of state and local educational agencies allocation priorities which traditionally spent more per child in those schools with high concentrations of students from high income families (Barrow, 1974, pp. 59-66; Mundell, 1975; Owen, 1972). Others saw Title I as a cleverly disguised general aid program. These individuals recognized the political expediency of using the "disadvantaged child" as a symbolic rallying point to get the bill passed, and believed that Title I was designed to provide general aid to districts with limited property tax bases. Unlike the reform interpretation, the assumption here is that the present institutions are functioning as well as can be expected, and they just need more money to better address the problem of educating poor children.

These two interpretations call for two very different implementation scenarios. The reformist would accept a strong federal involvement in the development, implementation, and evaluation of state and local projects; whereas, the other interpretation would limit federal involvement to determining the size of entitlements and signing checks (Stoner, 1976, pp. 84-89). The two priorities (1) the reform agenda of some of the program's original designers, and (2) the maintenance of state and local control over federal funds, form the underlying ideological tension for the implementation of Title I over time.

The Program had two other objectives as well--accelerating the pace of desegregation in the South and strengthening federal-state relations by increasing the capacities of state departments of education. Hundreds of Southern school districts received an increment of 30 percent to their total operating budget. This influx of funds was a "sugar solvent" designed to melt Southern resistance to quick desegregation in order not to forfeit the windfall funds. Title I also initially provided one percent of its $1.3 billion for state agencies (now two percent of its $3.08 billion) for state agencies to administer the Program. In effect, ESEA represents a deliberate policy of underwriting the growth and reorientation of state departments of education which had historically been independent of, and in part, antagonistic to increases in federal administrative control (Wirt & Kirst, 1972, p. 155).

Compromise and ambiguity were evident in the distribution of administrative responsibilities as well as in the Program's objectives. The United States Commissioner of Education shared with state and local

educational agencies (LEA's and SEA's) responsibilities for administering Title I projects. In summary, the responsibilities were distributed in the following manner:

·The United States Office of Education

a) develops and disseminates regulations, guidelines, and other materials regarding the approval of Title I projects; and,

b) reviews and assessess the progress under Title I throughout the nation.

·State Education Agencies

a) approve proposed local projects in accordance with federal regulations and guidelines;

b) assist local educational agencies in the development of projects; and,

c) submit state evaluation reports to USOE.

·Local Education Agencies

a) identify the educationally deprived children in the areas where there are high concentrations of low-income families and determine their special educational needs; and,

b) develop and implement approved projects to fulfill the intent of Title I (Wirt & Kirst, 1972, pp. 154-155).

The inclusion of these multiple objectives and overlapping governance responsibilities, indeed, facilitated a speedy congressional affirmation of the Act. Only during the implementation process did the categorical priorities evolve and the jockeying for administrative control of the Program begin.

In order to maintain a manageable analytic scope for a longitudinal analysis, we compared across time changes in two of the fourteen major Program requirements (or Program administrative outputs): targeting and program design requirements. If a program is to be successful, monies must first reach the intended beneficiaries. Targeting requirements

detail the criteria for the selection of eligible schools and children who are to participate in the Program within these schools. Once the monies reach the targeted schools and students some reporting mechanisms are necessary for federal officials to determine how the schools are spending Title I monies. Program design requirements set forth that each Title I school must identify their project's objectives and detail the activities and services used to realize these stated goals. We have chosen these two requirements for cross-time comparisons as representatives of the two major categories of Title I requirements: funds-allocation requirements and program development requirements (These are discussed in more detail on pp. 29-30).

AN EMPIRICAL RATIONALE FOR A LONGITUDINAL PERSPECTIVE

The evaluations of Title I's administration during the first five years splashed horror stories of weak federal administration and even malfeasance (Martin & McClure, 1969; Murphy, 1973; Wargo, 1972); early impact studies consistently found neglible educational impacts of the Program on Title I students (Glass, 1970; Hawridge, 1968; Picariello, 1969). After four years of the Program's operation (1965-1969), the first comprehensive evaluation of Title I's administration by an external research group concluded that "many of the misuses of Title I funds were so gross that even non-experts can readily spot them" (Martin & McClure, 1969, p. 104). All other early studies of Title I administration by external research agencies or individuals have reinforced this first negative assessment of wide-scale misallocation of Title I funds during the first four years of the Program.

The major analysis of Title I administration conducted by a contracted research agency during the middle years of the Program, from 1972 to 1973, used extensive interviews with USOE area desk personnel responsible for the monitoring practices of SEA's, site visits to five states, and questionnaire data from a sample of 10 states and 36 LEA. Their general conclusion was that "the administration of the program in the Division of Compensatory Education is far more effective than the critics would have one believe" (The Silken Purse, 1973, pp. 16-18). However, they described the administrative efficiency and effectiveness as "quite depressing." Their major findings were that: (1) regulations published by USOE were inadequate for LEA's and basically worthless for SEA's; (2) criteria used by the DHEW Audit Agency to determine non-compliance were drawn directly from the statutes since the regulations were inadequate; (3) USOE did not take into account LEA reporting burden; (4) evaluations of Title I educational impact were not satisfactory; and (5) enforcement of sanctions for non-compliant behavior identified in DHEW audits were virtually non-existent.

More recent assessments of Title I management by external research organizations depict a strikingly different scenario. Using essentially the same major data source as the first compliance study of Title I (Health, Education, and Welfare Audit Agency audit reports), but covering eleven years rather than just the first four, Stanford Research Institute noted among its "most important trends" that "... most states have developed adequate to good procedures for reviewing LEA [local education agencies] applications for Title I funds. These systems have greatly reduced many of the initial problems. However, more subtle

problems remain...." and "at the LEA level, blatant misallocation of funds which clearly violated the intent of Title I have been substantially reduced" (SRI, 1977, pp. iii). (b) Based primarily on the findings of three other external analyses of Title I administration using data from 1972 to 1977, a long-time analyst of Title I with the Syracuse University Research Corporation contends:

> The common view of Title I administration may be overly pessimistic and unjustified. A more current 'end of the decade' view of the federal-state-local partnership could provide a good deal more confidence in the ability of the federal government to influence the operation of categorical programs in local school systems (1978, p. 156).

Over time, for example, our research reveals that federal efforts to target more Title I dollars to each participating student have been particularly successful. The ambiguous statutory language requires that Title I projects must be "of sufficient size, scope, and quality" to ensure that monies are not spread too thinly, and thereby threaten to diminish the effectiveness of the projects. In the early years of the Program, there was a strong tendency for districts to use Title I as general aid by allowing more students to participate than were actually eligible to receive Title I funds. Table I indicates, for instance, in 1966 approximately 5.5 million students met Title I's eligibility criteria for poverty. Yet more than an estimated 8.2 million students actually participated in the Program, almost one-and-a-half times the number of eligible students. In contrast, in 1978, while about nine million students were counted for local entitlements, only five million students actually participated in the Program, or less than 60 percent of the eligible students. This contributed to an increase in per-pupil expenditure from $116 in 1966 to $378 in 1979. Discounting for

the effects of inflation (Row V), this translates into a 62 percent increase in per-pupil expenditure over these thirteen years.

It is important to note that during this same time when per-pupil expenditures were increasing by 62 percent in real dollars, the total appropriations for Title I in dollars adjusted for inflation actually declined by five percent (Row 7). Therefore, larger per-pupil expenditures were due to increased targeting of funds by local district rather than additional appropriations.

Longitudinal studies aggregating more recent implementation data are also needed to partially abate the tendency by some researchers, even those quite knowledgable in public policy literature, to cite dated, short-run analyses as if these accounts still applied today (Berman, 1980; McLaughlin, 1978). For instance, a prominent economist who has written prolifically on educational equity issues and specifically on Title I, concludes in 1977: "The ostensible inability of Title I Programs to create even a nominal impact on student scores in basic skills seems to be endemic to the program" (Levin, 1977, p. 156). The studies on which he bases his conclusion, however, contain achievement data collected between 1965 and 1969, the first four years of the Program. More than a decade of changes have occurred since then. Substantial changes have been documented in the Program's legal framework (LCCRUL, 1977), federal and state monitoring procedures, (SRI, 1977; The Silken Purse, 1973), and federal enforcement efforts (Demerest, 1977; "OE Collecting," 1980; Pollen, 1975). In fact, the most recent impact study for Title I argues for an extention of Title I programs into the summer months to maintain the increases in reading and math

Table I: Targeting Figures for Title I from 1966 to 1978[a]

		1966	1970	1974	1978
I.	Children (in millions Counted for LEA Entitlements[b]	5,531	6,952	6,247	9,045
II.	Participating	8,235	7,526	6,100	5,155
III.	Percent Participating of Counted	1.49	1.08	.98	.57
IV.	Per-pupil Expenditure (unadjusted)	$116.46	$161.98	$247.75	$378,52
V.	Per-pupil Expenditure (adjusted for inflation)[c]	119.81	139.92	167.73	193.71
VI.	Total Title I Appropriation (in millions)	1,193	1,339	1,653	2,247
VII.	Total Title I Appropriation (in millions) Adjusted for Inflation	1,217	1,151	1,232	1,162

[a] Figures derived from tables provided by Department of Health, Education, and Welfare, Office of Education.

[b] Figures for Rows I and II include only "educationally disadvantaged" children but do not include handicapped, juvenile delinquents, migrants, or children in agencies for the neglected.

[c] All adjusted figures are derived from the Bureau of Labor Statistics "Consumer Price index for All Urban Consumers U.S. City Average" with 1967 as base year.

attained during the regular school year Title I programs (SRI, 1977, pp. 43-52 and 57-61). (a) While the evidence on pupil achievement is mixed, we contend the evidence on implementation congruence with federal objectives is more conclusive.

EXPLANATORY FORCES

We have found that an interest group framework integrated with a social movement perspective provides a useful model of explanation for longitudinal implementation research. In the context of Title I, an interest group perspective couches explanations in the political interplay among what has been called the "iron triangle," consisting of:

- Congress, and more specifically the Congressional subcommittees responsible for educational legislation;
- implementing agencies; and,
- professional education and special interest lobbies.

In the tradition of educational federalism, the symbolic language of the legislation accorded to each level of administration a potential for substantial power. The law gave to the Commissioner of Education, the responsibility to develop "basic criteria" which the states were to use in their review of local applications. The states were reserved the power to approve or disapprove these projects. The local districts had wide latitude in planning, implementing, and evaluating the actual programs, be they for school construction or remedial programs for a highly selective group of students.

Overall, incremental change in the direction of more federal control has been characterized by an on-going series of sallies, retreats, and parleys by (1) growing internal and external constituencies who see

ESEA as a vehicle for changing schools and who favored or at least accepted a strict interpretation of the categorical intent of Title I, and (2) traditional education lobbies; most Congressmen; and local and state as well as a large number of federal administrators who preferred general aid and minimum federal involvement.

Early in Title I's history the lobby group scenario was almost exclusively dominated by interest groups representing established professional educational constituencies. These lobbies included, for instance: (1) National Education Association, (2) Council of Chief State School Officers, (3) National School Board Association, (4) American Association of School Administrators, (5) National Association of State Boards of Education, and (6) National Congress of Parents and Teachers. These six major educational lobbying blocks, known in Washington circles as "The Big Six," have rarely joined forces to form a unified lobbying front; however, they in general share an ideological preference for protecting local and state control of education and minimizing federal regulations. Other active lobbies usually with strong general aid preferences have been producers of educational materials and supplies. Another general aid educational lobby group more active in the later part of the Title I implementation history is the Council of Great City Schools.

Over the years, the one lobby group promoting categorical restrictions on Title I funds during the initial enactment of Title I, the National Catholic Welfare Board, has been joined by a number of other groups concerned with resisting efforts to turn Title I into a general aid program. These interest groups generally represent special or focused

interests of the providers or recipients of Title I funds, and include: National Advisory Council for the Education of Disadvantaged Children, the National Welfare Rights Organization, the Legal Standards and Education Project of the NAACP, the Lawyers Committee for Civil Rights Under Law, the National Association of Administrators of State and Federally-Assisted Education Programs, and the Education Commission of the States. Some of the lobbying, technical assistance and other advocacy processes of the special focused pressure groups have received financial or consultative support from such organizations as the Ford Foundation and the Harvard Center for Law and Education.

In 1965, before these interest groups coalesced, Commissioner Keppel attempted to withhold all Title I funds from the Chicago schools until a civil rights investigation was completed. Illinois State School Superintendent Page informed Chicago's Mayor Daley of the impending loss of funds, and Daley in turn complained to President Johnson of unlawful federal intrusion into the local domain of providing public education. Under pressure from Johnson, Keppel rescinded the withhold ruling within five days. USOE's first attempt to flex its jurisdictional muscle resulted in a precedent which for a time reduced its autonomy in the implementation of Title I (Hughes & Hughes, 1972 pp. 63-66). The battle, however, had just begun.

A handful of new middle-level staff members gave initial impetus to continued attempts from several quarters at translating ambiguous statutory language into a more tightly monitored program. This small band of reformers in effect formed an internal constituency group within the largely traditional USOE bureaucracy. They had two basic strategies.

First they persisted in pushing for an expansion of the "basic criteria" powers relegated to the Commissioner by making more explicit the regulations guiding states' approval of local applications. The criteria they initially developed were to a large degree successfully resisted by more traditional elements within USOE and opposed by state and local administrators. After the widely publicized release of the Martin and McClure report in 1969, other task forces again recommended tougher restrictions on the allocation of Title I funds, increased monitoring, and improvements in the resolutions of complaints by outside groups. As might be expected, the traditional forces were partially successful in watering down these recommendations, but when compared to the initial requirements and monitoring practices, substantial changes had accumulated through year-by-year incremental movement toward a more active federal involvement in the Program's administration.

Second, these reformers took several steps to establish constituencies at the state and local levels which would advocate or at least accept a stricter categorical interpretation. They, for instance, encouraged the use of funds set aside for the state administration of Title I to establish special compensatory education units in each state department in order to circumvent the Chief State School Officers who generally were strong supporters of general aid. They actually invented the title of "State Title I Coordinator" and began bombarding these mythical figures with letters and bulletins and inviting them to regional meetings where Title I regulations and program materials were discussed, modified, and disseminated (Hughes & Hughes, 1972, pp. 41-42). These figures are not so mythical today. In 1977 all states had categorical units headed by special directors of compensatory education.

The $26 billion spent on Title I has spawned a national-to-local professional hierarchy with careers dependent upon and commitments more aligned with providing special services to disadvantaged children. With state and federal categorical programs assuming a larger percent of public school expenditures, most urban and large suburban districts have not only local categorical program directors but also special program units operating at the district level. These staffs are versed in the technical skills required to cope with the bureaucratic minutia seemingly endemic to federal social programs. In California, the special program coordinators from the state's 33 largest school districts, to which more than 80 percent of the state's Title I funds are targeted, have formed an informal consortium which holds monthly meetings and provides a vehicle for frequent and rapid exchange of information about technical aspects of implementation. These state-wide consortiums are linked in a national network through regular regional meetings, yearly gatherings in Washington, and frequent newsletters and special bulletins under the auspices of the National Association of State and Federally-Assisted Education Programs. These formal and informal organizations foster strong informal norms to watch-dog district decisions so that they are consonant with categorical program requirements.

Parents of Title I children and of several state compensatory education programs are also organized from the school to the federal level in district, state, and federal advisory councils. At the federal level, the Lawyers' Committee for Civil Rights under Law, National Advisory Council for Education of Disadvantaged Children and several Civil Rights groups have proven to be increasingly active and effective lobby groups.

Duane and Bridgeland in their study of Michigan's educational politics noted (a) special and compensatory education lobbies were among the most powerful education lobbies in the state, and (b) directors of special education and compensatory education were among the most influencial individuals in the state educational policy process. A Washington-based public interest law firm, the Lawyers' Committee for Civil Rights Under Law (LCCRUL) has played a substantial role in improving enforcement of Title I categorical requirements. Its activities have included the preparation of manuals for bringing suits against districts believed to be in violation of Title I statutes and comprehensive analyses of the Program's legal framework. Several of their recommendations for strenghtening the program requirements are quite evident in the 1978 amendments. In fact, the final 1978 Title I amendments bare a striking resemblence to the draft statute prepared by Robert Silverstein of LCCRUL.

The point to be made here is that the character of interest groups participating in implementation decision-making processes has slowly moved from a virtual monopoly of traditional professional interest groups (such as the National Education Association and the National Association of Chief State School Officers) with a strong general aid preference to a more diverse interest group situation. Numerous constituencies are now articulating an emphasis on enforcing the categorical goals for the Program. Further, from a longitudinal perspective, these incremental changes when aggregated have resulted in a substantive shift in the nature of the interest group agendas toward targeted aid as intended by the Congress and USOE. These enforcement oriented interest groups found allies in the Congress such as Senator Mondale and Senator

Kennedy. They were reinforced by aggressive OE Title I administrators such as DHEW Assistant Secretary, Timothy Wirth and USOE Compensatory Education Director, Richard Fairley.

Recently political scientists have recognized that beyond relying on more readily observable, but perhaps somewhat myopic iron triangle explanation for public policy formation and implementation, some consideration should be given to the impact of broad based social movements. Explaining longitudinal changes in Title I's implementation involves more than documenting how one or several ideologically-consonant interest groups have co-opted other lobbying constituencies serving their own private interests. Increased monitoring and oversight of Title I operations need to be seen in the light of a broader public demand for accountability in government and business during the late 1960's and early 1970's. Malpractice suits, in unprecedented numbers, held physicians accountable for their diagnoses and treatments. Automobile manufacturers were made liable as never before for injuries resulting from improper design of their products. Few government agencies were immune from such accountability reforms as management by objectives, programmed budgeting, and PERT charts. Monitoring was just one remedy in the accountability movement's grand grab-bag.

One spin-off effect of the desegregation and antipoverty movements over the last two decades has been to legitimate federal administrative and judicial intervention in the schools. Court-appointed monitors have taken control of entire districts when judges have deemed the response

of local school boards to be inadequate to long-standing desegregation mandates. Federally funded legal aid lawyers prepared a large number of lawsuits charging school districts and states with Title I violations.

Like Cyert and March, we have found vague, consensual goals are eventually more specifically operationalized in organizational routines or standard operating procedures. And we believe explanations for the direction of these changes, while influenced by numerous other factors are best understood by integrating an interest group perspective with attention paid to the long-term effects of how relevant social movements affect policy reformulation and implementation.

THE USE AND ANALYSES OF DATA

Recent meta-implementation studies have generated some useful guidelines for the use and analysis of data for a longitudinal implementation perspective.

In examining the approaches of eleven "exemplary" implementation studies conducted over the last decade, Yin found one salient methodological similarity of these studies was that "evidence is collected from every possible source in every conceivable manner" including:

- unstructured discussions
- structured interviews
- documents and new reports
- participant observations
- field observation
- published reports written by one or more of the participants

He concludes "one of the potential lessons is that two or more of these methods should be used in any given study of implementation" (Yin, 1979, p. 19).

The use of a confluence of sources can both increase the reliability of the findings and appears necessary in light of the gaps likely to exist and the biases which are inherent in any one source of information. Reliability is enhanced by the utilization of a confluence of data since once a proposition is confirmed by two or more sources, even with all their sources of error, the certainty of an interpretation is greatly improved (Webb, Campbell, Schwartz, & Sechrest, 1971, p. 2).

For instance, one of the more problematic, and yet pivotal considerations in implementation studies is the determination of congressional intent. Most researchers proceed with the implicit assumption that a careful reading of the statutes suffices for arriving at the legislative objectives. Our research has repeatedly demonstrated that a "triangulation" of evidence relying also on Senate and House hearings and their special reports in conjunction with the statutes provides a much more accurate portrayal of congressional intent than the statutes by themselves since the symbolic language of the statutes is often more fully articulated in these other documents.

Primary data sources for a longitudinal implementation study of this type should include:

- Legal Framework Documents
  - a) relevant statutes and subsequent amendments
  - b) original regulations and subsequent modifications
  - c) program guides
- Technical Assistance Materials
  - a) program guides
  - b) audit checklists

c) other technical assistance packages and notices

- audits and other compliance reports
- house and Senate hearings and reports
- position papers and correspondence from professional and advocacy interest groups
- previous assessments of the Program's administration

Secondary data sources could include:

- personal accounts of implementers (For Title I, these usually interweave the personal experiences of these individuals with a rich source of internal documents, conversations, interviews, and public documents which detail key sequences of events)
- short-run implementation studies by contracted research firms and internal compliance and enforcement reports
- articles in professional journals and other publications

Methodologically, then, longitudinal implementation research primarily involves a secondary and tertiary synthesis and reinterpretation of an extensive source of existing documents. When key pieces of information are missing or existing documentation is in conflict, interviews with appropriate staff members, congressional aides, or researchers involved in previous implementation studies can be helpful. Despite the biases and limitations of documentary evidence, we have found a good deal of truth in the Chinese proverb that "The palest ink is clearer than the best memory."

The substantive reliance on existing documentary evidence does require assessing the validity of the information in these documents since one can expect internal reports especially to contain as much a rhetorical as an informational intent. In weighing the validity of these secondary analyses, we consider three factors:

- the position and agenda of the person or organization responsible for the writing and publication of the report
- the motivation for the report
- the factural accuracy of the information on which the interpretations are based

Unless there is strong evidence to the contrary, we judge information contained in external reports by contracted researchers to be more valid than the agency reports. This does not suggest that analyses by external research organizations are without biases. Their analyses are limited by the data available to them, time constraints, personal and professional assumptions, and other factors. They, for example, generally lean toward a Washington-view of the world since their research services are typically contracted by federal agencies. Besides these rather simple decision rules, the method in which the facts of the implementation experience are pieced together and how the evidence is merged from various sources remains largely an informal process which must be entrusted to the discretion of the investigator.

METHODOLOGICAL CONSIDERATIONS

Although empirical and theoretical arguments abound for assuming a longitudinal implementation perspective, little guidance exists for how to actually conduct such research. In our exploratory efforts to analyze the implementation of Title I over a thirteen-year period three major methodological questions have continued to resurface which have generalizable import:

- What explanatory and dependent factors should be traced across time? How is variation in these variables described?

·What types of evidence should be used?

·How is such evidence best analyzed?

Our response to these questions reflects as much the limitations of the present state of the art as they do shed light on partial answers to perplexing methodological issues.

Longitudinal implementation case studies which are most likely to contribute to theory building fit under the rubric of what Alexander George has called "controlled focused case studies". In such studies seemingly idiosyncratic aspects of explanation for each case are formulated in terms of variables which can be compared across cases (i.e. across programs or time periods). In a longitudinal study, a "case" represents a block of years of implementation which can be compared to one or more other blocks of years.

We postulate at least three related dimensions describing implementation should be considered across time:

·policy outputs of implementing agencies;

·compliance with policy outputs by lower-level subunits; and,

·actual impacts on intended beneficiaries.

POLICY OUTPUTS OF IMPLEMENTING AGENCIES

A comparison of relevant policy documents both for determining the internal consistency of these documents at a particular point in time as well as for noting changes across time provides one vehicle for assessing a program's implementation.

Such documentary analysis, of course, should include tracing changes in the initial enabling legislation and affiliated legal documents

However, statutes, sometimes allocating millions of dollars at the stroke of single subsection, are often plagued with deliberately obfuscated language to broaden political support for the legislation. Winning coalitions are often held together by the adhesive of ambiguous language which successfully masks unresolved differences among competing interest groups and legislators. Statutes are as heavily laced with symbolic rhetoric as they are replete with allocative formulae and regulatory prescriptions (Edelman, 1964 chp. 1). Therefore, in order to detect shifts in objectives and priorities it is also necessary to closely analyze those documents which in essence operationalize the symbolic import characteristic of most statutes. These include regulations, mandatory and explanatory criteria, guidelines, technical assistance packages, audit check-lists, application forms, evaluation mechanisms, and complaint resolution processes.

Some scheme for categorizing policy outputs is usually essential for comprehensive and manageable cross-period comparisons, given the typical proliferation of policy documents over time and the regulatory complexity characteristic of most federally-sponsored social programs. (See Table II in Appendix for one method of categorizing policy outputs at one point in time for cross-time comparisons). Such a categorization scheme would identify the major Program requirements and block them into some logical groupings. The Title I legal framework, for instance, contains fourteen major Program requirements which roughly can be divided into two categories: funds-allocation requirements and program-development requirements. Funds-allocation requirements are intended to ensure that Title I funds actually reach the intended schools and students and

are spent on appropriate categories of expenditures. The program-development requirements encompass a potpourri of qualitative issues such as program evaluation, parent participation, and planning activities.

In order to maintain a manageable analytic scope, we have compared across time changes in two of the major Program requirements (or Program outputs): targeting and program design requirements. Title I schools are chosen on the basis of economic criteria, so that limited Title I funds can be concentrated on those schools within a district with the highest concentration of children from low-income families. Once the schools in a district are identified by these economic criteria, children within each eligible school are selected for participation on the basis of lowest test scores or other methods for assessing educational deprivation. There are, then, two steps embedded in law to help ensure that funds are not spread too thinly: (1) economic criteria for limiting the number of eligible schools; and, (2) educational criteria for restricting the number of children participating in Title I projects within these schools.

A focused comparison of the criteria used to operationalize these targeting requirements across time allows the analyst to determine whether auditors had adequate indicators for assessing if Title I funds were actually reaching the intended beneficiaries.

The program design regulation requires that a formal plan be developed by districts receiving Title I funds. This plan must set forth the school's objectives and specify the activities and services to accomplish the desired ends. A cross-time focused comparison of the criteria for these requirements provides partial insights into the detail of

information federal officials could obtain from local districts on how they were spending Title I funds. These "snap-shots" of policy outputs then can be compared across time along several dimensions:

- changes in the degree of local discretion;
- the legal force of the interpretation (a mandatory regulation vs. an advisory suggestion);
- the frequency and scope of the dissemination of these interpretations; and
- the specificity of the information required in application, accounting, and evaluation reports.

In addition to tracing any changes in the conceptualization of these requirements (usually in the statutes) and the operationalization (usually in the regulations, guidelines, and audit checklists), one needs to compare across time the monitoring and enforcement policies and procedures in place as well as other incentives for compliance with policy standards. Some descriptive scales for comparing variance could include:

- the types and frequency of sanctions for misspent funds,
- the types and frequency of monitoring reviews, and
- the types of procedures for adjudicating alleged violations of program regulations and for enforcing appropriate sanctions.

For both the requirements we have traced (targeting and program design) each of these dimensions has increased dramatically over the last 13 years in terms of the procedures intended to enhance the congruence between the categorical intent of the legislation and actual local implementation activities (Goettel, 1978; LCCRUL, 1977; SRI, 1977b; Stoner, 1976).

COMPLIANCE BY LOWER-LEVEL SUBUNITS

For Title I there are two major types of compliance documents. Primary compliance reports include comprehensive audits conducted by the Health, Education, and Welfare Audit Agency (HEWAA) and usually less rigorous Program Reviews conducted by USOE officials annually for each state since 1970. In addition, several external research agencies and special tasks forces have produced numerous "snap-shot" compliance and enforcement reports covering one-to-five-year periods. These reports have used a number of approaches including reanalyses of primary compliance documents, structured and unstructured interviews, field observations, and in-depth case studies of selected states, or some combination of these methodologies.

Even with this plethora of compliance documentation several problematic methodological issues have surfaced in constructing cross-time comparisons of sub-unit compliance. First, federal efforts to monitor the Program have increased substantially over time. USOE did not begin conducting annual on-site visits to state and local districts until 1970, five years after the initiation of the Program. In 1967 only three states were audited by HEWAA. Now almost a third of the states are audited each year. Second, the process for selecting states for audits is hardly random. The principle selection factors are the date of the last audit, available manpower, requests or complaints from various sources, and other indications of problems. Third, the lack of mention of problems or non-compliance, especially in the early years may be due to inadequate criteria for substantiating allegations of non-compliance, to a lack of interest in enforcing a requirement at a particular time,

or to benevolent neglect in order to maintain a cooperative working relationship among federal, state, and local officials (SRI, 1977; pp. 4-5). (b) Therefore, simple numerical comparisons of violations across time are likely to reveal more about the changes in the rigor of the monitoring efforts than improvements or slippages in state and local agencies' compliance. For instance, during the first five years of the Program there were no quantitative criteria for determing whether a district receiving Title I funds was providing comparable services to Title I and non-Title I schools. Only after 1972 were "comparability" criteria integrated into the audit checklists, and it is exactly at this time that such violations began showing up in primary compliance documents.

In 1965, USOE had neither the history, resources, nor mandate from Congress to closely monitor the expenditures of educational funds from federal coffers. Local control of schools, vested in over 16,000 independent school boards remains a dominant, although increasingly myth-like value in the United State--a value which prior to 1965 had run counter to federal employees observing elementary and secondary classroom activities and monitoring district-level operations. Before the passage of ESEA, USOE was known primarily as a check-writing and statistics-collecting operation. The original Title I statutes merely required that states submit broadly-worded assurances that they would approve local applications which complied with the ambiguous intent of the legislation. After a well-publicized wrangle with the Senate Education Subcommittee in 1967, USOE finally disseminated the first authorized set of guidelines in March of 1968, a full three years after the passage of the enabling legislation. The violations uncovered in the scattered

HEWAA audit reports were not publicized until the publication of the Martin and McClure report in 1969 (Stoner, 1976, pp. 118-120).

Quite a different scenario exists today. Although numerous problems persist, a magnum opus study of Title I's legal framework concluded that the Program's requirements are generally necessary, consistent, and flexible (LCCRUL, 1977, pp. 50-63). In contrast to even five years ago, USOE has recovered nearly $1.5 million in misspent funds and is presently working to collect at least $2.2 million more as a result of audit findings over the last four years ("OE collecting misspent, 1980, p. 3). Even though the funds actually collected by USOE for disallowable expenditures is a small percent of the dollar expenditure exceptions noted in DHEW Audit Agency reports there is growing evidence that state and local education agencies now fear that they might be next and that a shift to federal aid with "no strings" attached is highly unlikely in the near future (LCCRUL, 1977, p. 87).

IMPACT STUDIES

During the first seven years of Title I alone, over $50 million was spent on impact evaluations (McLaughlin, 1975, p. 180). Typically these studies have attempted to assess the Program's impact by reducing the goals of the Program to monthly or yearly growth rates on standarized reading, writing, and math tests. Much more has been learned about how not to go about conducting such impact studies and about the resistance of local education agencies to federal efforts at collecting the data for such assessments than about the actual impacts along these dimensions on Program recipients. In short, these types of impact studies

have raised more questions than they have answered. And there is little to suggest that they have had much of an impact on Congressional attitudes about the Program. Measures of "impact" other than standarized reading scores merit consideration. Some attention should be given to the:

- influence of Title I on the design and proliferation of state compensatory education programs
- influence of Title I on the design of other more recent federal education programs
- the effects of ESEA and other federal categorical legislation on the involvement of parents in school and district advisory councils; and,
- the affect of state "set asides" for Title I and other federal education initiatives on the growth and organization of state departments of education.

Our basic argument is that the concept of "impact" is often too narrowly defined and that indirect impacts of legislated social programs should receive further consideration. Our synthesis of the studies cited on pages 29-31 demonstrate a significant impact on each of these dimensions of impact provided a 13-year perspective is employed.

CONCLUSION

In his poem,"The Rock", T.S. Eliot inquires, "[w]here is the knowledge we have lost in information". Although some deplore the paucity of implementation research and useable information, our claim is that we face an abundance of information on implementation. More original research is, no doubt, required, but perhaps more importantly we need to know how to extract knowledge from the information we already have. Implementation and organizational theory, growing empirical evidence, and

our own exploratory investigation into the implementation of Title I provide a compelling rationale for using a long-run perspective. Our longitudinal research demonstrates that: (1) initial consensual goals, often vaguely stated, are formalized incrementally over time in organizational routines through on-going bargaining and compromise process; (2) that the directions of these changes are influenced by the strength, agendas, and resources of the constituencies participating in the policy formation and implementation processes as well as broader social movements; and, (3) the evidence for longitudinal implementation studies needs to be garnered from a confluence of sources.

There is, nonetheless, a need to further develop protocols and methods for a more orderly integration or primary and secondary implementation data sources in order to more systematically carry out such longitudinal analyses during the next generation of implementation research.

Appendix A

CATEGORIZATION SCHEME FOR TITLE I PROGRAM OUTPUTS

This table illustrates one method for categorizing policy outputs in the Title I context for cross-period comparisons. On the horizontal axis, major categories of regulations are identified. The Title I legal framework, for instance, contains fourteen major categories of requirements which roughly can be divided into two categories: funds-allocation requirements and program-design requirements. Funds-allocation requirements are intended to ensure that Title I funds actually reach the intended schools and students and are spent on appropriate categories of expenditures. The program-design requirements encompass a potpourri of qualitative issues such as program evaluation, parent participation, and planning activities. On the vertical axis, the major rule-setting policy outputs are specified and ranked in order of degree of legal forces, from statutes having "the full force and effect of law" to interpretive suggestions.

TABLE I: POLICY OUTPUT CATEGORIZATION SCHEME FOR CROSS-TIME COMPARISONS

TYPES OF POLICY OUTPUTS: Program Requirements	Eligibility	Targeting	Maintenance of effort	Comparability	Non-supplanting	Excess cost	Equitably provided	Needs assessment	Program design	Concentration	Coordination	Impact evaluation	Parent Involvement
Formal legal framework -statute -regs. -criteria													
Informal legal framework -guides -audit checklists -informal suggestions													
	FUNDS-ALLOCATION REQUIREMENTS							PROGRAM-DEVELOPMENT REQUIREMENTS					

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